

1 ALLISON M. BROWN (Admitted *Pro Hac Vice*)
2 alli.brown@kirkland.com
3 JESSICA DAVIDSON (Admitted *Pro Hac Vice*)
4 jessica.davidson@kirkland.com
5 CHRISTOPHER D. COX (Admitted *Pro Hac Vice*)
6 christopher.cox@kirkland.com
7 **KIRKLAND & ELLIS LLP**
8 601 Lexington Avenue
9 New York, NY 10022
10 Telephone: (212) 446-4800

11 MICHAEL B. SHORTNACY (SBN: 277035)
12 mshortnacy@shb.com
13 **SHOOK, HARDY & BACON L.L.P.**
14 2121 Avenue of the Stars, Suite 1400
15 Los Angeles, CA 90067
16 Telephone: (424) 285-8330

17 PATRICK OOT (Admitted *Pro Hac Vice*)
18 oot@shb.com
19 **SHOOK, HARDY & BACON L.L.P.**
20 1800 K St. NW Ste. 1000
21 Washington, DC 20006
22 Telephone: (202) 783-8400

23 *Attorneys for Defendants*
24 UBER TECHNOLOGIES, INC.;
25 RASIER, LLC; and RASIER-CA, LLC

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF MICHAEL B.
SHORTNACY IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS
DUPLICATE CASES**

This Document Relates to:

E.B. v. Uber Technologies, Inc., et al.,
No. 3:24-cv-09052-CRB

A.P. v. Uber Technologies, Inc., et al.,
No. 3:25-cv-02105-CRB

Date: December 12, 2025
Time: 10:00 a.m.
Courtroom: 6 – 17th Floor

1 *T.B. 1475 v. Uber Technologies, Inc., et*
2 *al.*, No. 3:25-cv-02989-CRB

3 *Jane Roe CL 146 v. Uber Technologies,*
4 *Inc., et al.*, No. 3:25-cv-03719-CRB

5 *E.B. v. Uber Technologies, Inc., et al.*,
6 No. 3:25-cv-04526-CRB

7 *Arpitkumar Patel v. Uber Technologies,*
8 *Inc., et al.*, No. 3:25-cv-05287-CRB

9 *Jane Doe LS 618 v. Uber Technologies,*
10 *Inc., et al.*, No. 3:25-cv-06160-CRB

11 *K.L. v. Uber Technologies, Inc., et al.*,
12 No. 3:25-cv-06178-CRB

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DECLARATION OF MICHAEL B. SHORTNACY

I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Los Angeles, California. I respectfully submit this declaration in support of Defendants Uber Technologies, Inc.’s, Rasier, LLC’s, and Rasier-CA, LLC’s (collectively, “Uber’s”) motion to dismiss the cases of certain Plaintiffs as duplicative of other cases filed by the same Plaintiffs in this MDL.

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., representing Uber in this MDL as well as in Judicial Council Coordination Proceeding No. 5188, *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the “JCCP”). I am a member in good standing of the Bar of the State of California, the Bar of the District of Columbia, and the Bar of the State of New York. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

4. Based on Defendants’ counsel’s review of the Complaints filed by Plaintiffs in this MDL, four Plaintiffs have filed two different actions in the MDL seeking relief based on the same facts and legal theories. Counsel for Uber emailed both sets of counsel for each of these four Plaintiffs to notify them of the duplication in cases and ask that it be resolved. The following chart provides information about each of the four Plaintiffs’ duplicate cases and the date of the notice provided by Defendants’ counsel.

Plaintiff	First-Filed Case in MDL	Later-Filed Case in MDL	Date/ Location of Alleged Incident	Date of Defendants’ Notice to Counsel of Duplicate Cases
E.B.	<i>E.B. v. Uber Technologies, Inc. et al.</i> , No. 3:24-cv-09052-CRB (N.D. Cal. Dec. 13, 2024)	<i>E.B. v. Uber Technologies, Inc. et al.</i> , No. 3:25-cv-04526-CRB (N.D. Cal. May 29, 2025)	June 9, 2021; Florida	August 21, 2025

Plaintiff	First-Filed Case in MDL	Later-Filed Case in MDL	Date/ Location of Alleged Incident	Date of Defendants' Notice to Counsel of Duplicate Cases
T.B.	<i>T.B. v. Uber Technologies, Inc. et al.</i> , No. 3:25-cv-02989-CRB (N.D. Cal. April 1, 2025)	<i>Jane Roe CL 146 v. Uber Technologies, Inc. et al.</i> , No. 3:25-cv-03719-CRB (N.D. Cal. April 29, 2025)	April 30, 2024; Shelby County, Tennessee	August 21, 2025
Jane Doe L.S. 618	<i>Jane Doe L.S. 618 v. Uber Technologies, Inc. et al.</i> , No. 3:25-cv-06160-CRB (N.D. Cal. July 22, 2025)	<i>K.L. v. Uber Technologies, Inc. et al.</i> , No. 3:25-cv-06178-CRB (N.D. Cal. July 23, 2025)	July 29, 2023; Dallas, Texas	August 21, 2025
A.P.	<i>A.P. v. Uber Technologies, Inc. et al.</i> , No. 3:25-cv-02105-CRB (N.D. Cal. Feb. 28, 2025)	<i>Patel v. Uber Technologies, Inc. et al.</i> , No. 3:25-cv-05287-CRB (N.D. Cal. June 27, 2025)	June 27, 2023; New Jersey	August 22, 2025

To date, only counsel for E.B. has responded to Defendants' counsel's notice of duplicate cases. In an August 21 email, E.B.'s counsel stated they "will let Uber know who is taking the lead." E.B.'s counsel, however, has never done so. To date, none of the identified duplicative cases for any of these four plaintiffs have been dismissed.

5. Due to Plaintiffs' failure to resolve the duplication of cases after receiving notice from Defendants, Defendants were forced to spend an approximate total of 24.6 attorney hours to research, draft, and prepare this motion, at a total approximate cost to Defendants of \$16,278.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 14, 2025 in Los Angeles, California.

SHOOK, HARDY & BACON L.L.P.

/s/ Michael B. Shortnacy

MICHAEL B. SHORTNACY (SBN: 277035)
mshortnacy@shb.com
SHOOK, HARDY & BACON L.L.P.
2121 Avenue of the Stars, Suite 1400

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Los Angeles, CA 90067
Telephone: (424) 285-8330
Facsimile: (424) 204-9093

Attorney for Defendants
UBER TECHNOLOGIES, INC., RASIER,
LLC, and RASIER-CA, LLC